

*I have three major concerns with an FCC grant of the petition referenced in RM-10352.*

*1. I would feel more comfortable if a petition requesting a major change to a domestic band allocation would have been filed by the ARRL with the support of its membership. As the petitioners indicate in their filing, there appears to have existed some disagreement between them and the ARRL on going beyond a voluntary band plan for 160 meters. I wish to note, and am certain the ARRL and FCC would agree, that band plans for 160 meters and other bands have worked very well for the amateur service where operators are self-regulating for the most part; therefore, I am not convinced that there is a need to impose further regulation on all radio amateurs by changing the allocation structure of 160 meters to satisfy the needs of a few DX operators.*

*2. In additional comments filed by the petitioners, there is new light shed on the fact that SSB operators would have to resort to "split-frequency" operation at times when the SSB DX stations are operating in the 1800-1843 kHz portion of the band. The problem with split operation is that the DX station can not always hear the weaker stateside SSB signals on its listening frequency and unintentional interference results on domestic QSO's taking place higher in the band. The 40 meter band is a good example of this where in recent months the FCC has cited several domestic DX operators for working split frequency operation on top of existing QSO's. The better solution is to allow domestic SSB operators to be on the same channel as the DX station to reduce unintentional interference on the upper portion of the SSB band, as is currently the case on 160 during CW and SSB contests which are scheduled at different times of the year. I also note that when these contests do take place, by gentlemen's agreement nearly the entire band is consumed by SSB or CW to allow a maximum number of operators on the band.*

*3. Requesting an exclusive narrowband allocation at a time when Morse Code testing requirements in the amateur radio service have been relaxed both domestically and internationally does not appear justified. This relaxation, and possible future elimination of the Morse testing requirement, indicates that future generations of amateur radio operators may no longer have a need for a CW allocation. The argument could be made, however, that other data modes may require a separate allocation in the future; but, as the petitioners state in their filing there is very little, if any, of this type of activity on 160 meters at this time.*

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